

# EXHIBIT C

**LEONARD S. ABRAMS, ESQUIRE**  
**Attorney I.D. No. 18557**  
**1500 Walnut Street, Suite 800**  
**Philadelphia, PA 19102**  
**(215) 972-0030**

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*Office of Judicial Records*  
*08 APR 2021 12:22 pm*  
*M. RUSSO*

**Attorney for Plaintiff**

**JANET RAWLINGS**  
6922 N. Broad Street, Apt. G-3  
Philadelphia, PA 19126  
**PLAINTIFF**

**COURT OF COMMON PLEAS**  
**PHILADELPHIA COUNTY, PENNSYLVANIA**

vs.

OCTOBER TERM, 2020

**NATIONAL PASSENGER**  
**RAILROAD CORPORATION**  
**DBA AMTRAK**  
2955 Market Street, 30<sup>th</sup> St. Station  
**DEFENDANT**

NO.: 01963

**CIVIL ACTION – COMPLAINT**  
**20 – PERSONAL INJURY – OTHER**

NOTICE

You have been sued in court. If you wish to defend against the claims set forth in the following pages, you must take action within twenty (20) days after this complaint and notice are served, by entering a written appearance personally or by attorney and filing in writing with the court your defenses or objections to the claims set forth against you. You are warned that if you fail to do so the case may proceed without you and a judgment may be entered against you by the court without further notice for any money claimed in the complaint or for any other claim or relief requested by the plaintiff. You may lose money or property or other rights important to you.

YOU SHOULD TAKE THIS PAPER TO YOUR LAWYER AT ONCE. IF YOU DO NOT HAVE A LAWYER GO TO OR TELEPHONE THE OFFICE SET FORTH BELOW. THIS OFFICE CAN PROVIDE YOU WITH INFORMATION ABOUT HIRING A LAWYER. IF YOU CANNOT AFFORD TO HIRE A LAWYER, THIS OFFICE MAY BE ABLE TO PROVIDE YOU WITH INFORMATION ABOUT AGENCIES THAT MAY OFFER LEGAL SERVICES TO ELIGIBLE PERSONS AT A REDUCED FEE OR NO FEE.

PHILADELPHIA BAR ASSOCIATION  
LAWYER REFERRAL AND INFORMATION SERVICE  
ONE READING CENTER  
PHILADELPHIA, PENNSYLVANIA 19107  
**TELEPHONE: (215) 238-6333**

AVISO

Le han demandado a usted en la corte. Si usted quiere defenderse de estas demandas expuestas en las paginas siguientes, usted tiene veinte (20) dias de plazo al partir de la fecha de la demanda y la notificacion. Hace falta asentar una comparencia escrita o en persona o con un abogado y entregar a la conte an forma escrita sus defensas o sus objeciones a las demandas en contra de su persona. Sea avisado que si usted no se defiende, la corte tomara medidas y puede continyar la demanda en contra suya sin previo aviso o notificacion. Ademas, la corte puede decidir a favor del demandante y require que usted cumpla con todas las provisiones de esta demanda. Usted puede perder dinero o sus propedades u otros derechos importantes para usted.

LLEVE ESTA DEMANDA A UN ABOGADO INMEDIATAMENTE. SI NO TIENE ABOGADO O SI NO TIENE EL DINERO SUFICIENTE DE PAGAR TAL SERVICIO, VAYA EN PERSONA O LLAME POR TELEFONO A LA OFICINA CUY DIRECCION SE ENCUENTRA ESCRITA ABAJO PARA AVERIGUAR DONDE SE PUEDE CONSEGUIR ASISTENCIA LEGAL.

ASOCIACION DE LICENCIADOS DE FILADELFIA  
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**Philadelphia, PA 19102**  
**(215) 972-0030**

**Attorney for Plaintiff**

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<b>JANET RAWLINGS</b>	:	
6922 N. Broad Street, Apt. G-3	:	
Philadelphia, PA 19126	:	
PLAINTIFF	:	<b>COURT OF COMMON PLEAS</b>
	:	<b>PHILADELPHIA COUNTY, PENNSYLVANIA</b>
	:	
vs.	:	OCTOBER TERM, 2020
	:	
<b>NATIONAL PASSENGER</b>	:	
<b>RAILROAD CORPORATION</b>	:	
<b>DBA AMTRAK</b>	:	NO.: 01963
2955 Market Street, 30 <sup>th</sup> St. Station	:	
Philadelphia, PA 19104	:	
DEFENDANT	:	

**CIVIL ACTION – COMPLAINT**  
**20 – PERSONAL INJURY – OTHER**

1. Plaintiff, **JANET RAWLINGS**, is an adult individual residing at the captioned address.
2. Defendant, **NATIONAL PASSENGER RAILROAD CORPORATION DBA AMTRAK** (“**AMTRAK**”) is a corporation or other business entity qualified to do business in the City of Philadelphia and the Commonwealth of Pennsylvania with a place of business at 2955 Market Street, 30<sup>th</sup> St. Station, Philadelphia, PA 19104.
3. **AMTRAK** regularly conducts business in Philadelphia County, Pennsylvania.
4. At all times material hereto **AMTRAK** was a common carrier operating passenger trains between 30<sup>th</sup> Street Station in Philadelphia, Pennsylvania and Union Station in Washington, D.C.

5. Plaintiff, **JANET RAWLINGS**, purchased a round-trip ticket (reservation number CAD0D4-10OCT18) to Washington D.C. leaving Philadelphia 30<sup>th</sup> Street Station on October 25, 2018 and returning to Philadelphia on October 28, 2018 (the return trip).

6. On October 28, 2018 Plaintiff, **JANET RAWLINGS**, was on the boarding platform in Union Station in Washington D.C. waiting to board the train for the return trip to Philadelphia.

7. Waiting with Plaintiff was her sister, also a ticketed passenger, for the return trip, who was in a wheelchair.

8. Plaintiff's sister had reserved handicapped seating on the train relating to her disability.

9. Plaintiff and her sister were ready to board at the front of the train to access handicapped seating when they were instructed by Amtrak personnel to walk to the back of the train because the handicapped seating in the front was not available.

10. Plaintiff then walked with her sister to the back of the train.

11. The boarding entrance at the back of the train was elevated above the platform at a height that was too high for Plaintiff and her sister to ascend.

12. Instead of securing a stepstool or other equipment that would have facilitated Plaintiff and her sister's access to the train, the conductor insisted that they needed to board the train the way it was because it was "running late."

13. The same conductor assisted Plaintiff's sister up the raised platform and on to the train but did not offer to assist Plaintiff.



14. When Plaintiff attempted to board the train, she was unable to climb the high step, lost her footing in the gap and fell hard to her knees on the boarding steps, sustaining serious bodily injuries as hereinafter set forth.

15. At all times material hereto **AMTRAK** was a common carrier required by law to exercise the highest duty of care and diligence for the safety of its passengers, including Plaintiff as she was boarding the train.

16. At all times material hereto **AMTRAK** was under a duty to comply with its prevailing practices and promulgated rules for the safety of its passengers, including Plaintiff as she was boarding the train.

17. At all times material hereto Defendant was acting by and through its agents, servants, workmen and employees who were acting at all times within the course and scope of their duties and employment.

18. The accident resulted solely from the negligence and carelessness of the Defendant and was due in no matter whatsoever to any act or failure to act on the part of the Plaintiff who was exercising due care at all times.

19. **AMTRAK** was negligent and careless and further violated the high duty of care owed by a common carrier to passengers in:

- a. Failing to provide a safe means of boarding its train for passengers;
- b. Stopping the train at a point where the boarding steps were too high for the passengers to ascend;
- c. Failing to supply a stepstool or other similar assistive device so that passengers could safely board on the platform where Plaintiff was injured;

- d. Employing personnel who were unqualified or improperly trained in safety protocols and techniques;
  - e. Failing to enact and/or enforce safety protocols for passengers boarding the train;
  - f. Failing to properly inspect the steps used for boarding the train;
  - g. Failing to properly maintain the steps used to board the train;
  - h. Failing to have adequate policies and procedures to ensure that the steps were free from hazardous and/or dangerous conditions;
  - i. Failing to comply with procedures and rules for safe boarding of the train;
- and
- j. Failing to exercise the degree of care and regard for the rights and safety of persons and Plaintiff in particular as was required under the circumstances.

20. As a direct result of the aforesaid negligence and carelessness of Defendant, Plaintiff, **JANET RAWLINGS**, suffered injuries which are serious and may be permanent, including, without limitation, disc herniations in the cervical spine at C5-6, C-6/7, sprained ligaments in the cervical spine, radiculopathy in the lumbar spine at L4-5, S1, sprained ligaments in the lumbar spine, chondromalacia, patella of left knee, sprained ribs, sprained left forearm, wrist and hand as well as injuries to the bones, joints, tendons, nerves, blood vessels, soft parts and other parts of the neck, back, upper and lower extremities, severe shock to her nerves and nervous system and various other ills and injuries both internal and external.

21. As a further result of this accident, Plaintiff, **JANET RAWLINGS**, has been and may in the future be obliged to receive and undergo medical attention and care and may be

obliged to continue to expend such sums or incur such expenditures for an indefinite time in the future.

22. As a further result of this accident, Plaintiff, **JANET RAWLINGS**, has or may suffer a severe loss of her earnings and impairment of her earnings capacity and power.

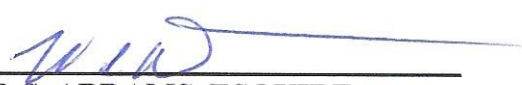
23. As a further result of this accident, Plaintiff, **JANET RAWLINGS** has or may hereafter incur other financial expenses or losses.

24. As a further result of this accident, Plaintiff, **JANET RAWLINGS**, has suffered severe physical pain, mental anguish, humiliation and loss of life's pleasures, and she may continue to suffer same for an indefinite period of time in the future.

**WHEREFORE**, Plaintiff, **JANET RAWLINGS**, demands judgment against Defendants in an amount not in excess of Fifty Thousand Dollars (\$50,000).

Date:

4/7/21

  
**LEONARD S. ABRAMS, ESQUIRE**  
**Attorney for Plaintiff, JANET RAWLINGS**  
**Pa. Supreme Court ID# 18557**  
**LAW OFFICES OF LEONARD S. ABRAMS**  
**1500 Walnut Street, Suite 800**  
**Philadelphia, PA 19102**  
**215-972-0030**  
**215-972-6976 – (FAX)**  
**leonardabrams@yahoo.com**

**VERIFICATION**

I, **JANET RAWLINGS**, hereby verify that I am the Plaintiff in the foregoing matter and that the facts set forth in the attached Civil Action Complaint are true and correct. I understand that false statements herein are made subject to the penalties of 18 Pa.C.S. §4904, relating to unsworn falsification to authorities.

  
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**JANET RAWLINGS**

Date: *Apr. 7, 2021*



**LEONARD S. ABRAMS, ESQUIRE**  
**Attorney I.D. No. 18557**  
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**Philadelphia, PA 19102**  
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**Attorney for Plaintiff**

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<b>DBA AMTRAK</b>	:	<b>NO.: 01963</b>
2955 Market Street, 30 <sup>th</sup> St. Station	:	
<b>DEFENDANT</b>	:	

**CERTIFICATE OF SERVICE**

**I HEREBY CERTIFY** that on this day, a true and correct copy of Plaintiff's Civil Action Complaint was served via electronic mail upon the following:

**Devon S. Davis, Esquire**  
**LANDMAN CORSI BALLAINE & FORD, P.C.**  
**1617 JFK Boulevard, Suite 955**  
**Philadelphia, PA 19103**

**Yuri J. Brunetti, Esquire**  
**LANDMAN CORSI BALLAINE & FORD, P.C.**  
**1617 JFK Boulevard, Suite 955**  
**Philadelphia, PA 19103**

Dated: 4/8/21

  
**LEONARD S. ABRAMS, ESQUIRE**  
Attorney for Plaintiff, **JANET RAWLINGS**